

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA)
)
vs.)
)
LAWRENCE LYNCH, et als)
Defendants)

Criminal No. 04-30046-MAP

U.S. DISTRICT COURT
DISTRICT OF MASS.

DEFENDANT, LAWRENCE LYNCH'S
MOTION FOR DISCOVERY

Now comes the Defendant, Lawrence Lynch in the above-entitled matter and respectfully requests pre-sentence discovery pursuant to Fed. Rules of Criminal Procedure 16(a)(1)(E), L.R. 116.2(A)(4) and Brady vs. Maryland, 373 U.S. 83 (1963). The Defendant pled guilty in the United States District Court on April 19, 2006 to Wire Fraud and Conspiracy.

Specifically listed in the Wire Fraud was the following property:

1. 617-619 Union Street, Springfield, Massachusetts;

With respect to the Conspiracy the following properties were included:

1. 327-329 Bay Street, Springfield, Massachusetts;
2. 125-127 Alderman Street, Springfield, Massachusetts;
3. 838-340 Worthington Street, Springfield, Massachusetts;
4. 62 Kenyon Street, Springfield, Massachusetts;
5. 14-16 Aspen Street, Ware, Massachusetts; and
6. 59-61 Avon Place, Springfield, Massachusetts.

The Defendant respectfully requests the Government provide him with any exculpatory evidence regarding the loss alleged by the Government as a result of loans for these properties.

Further, the Defendant requests any evidence regarding relevant conduct with respect to any other property not previously listed that the Government intends to include in any loss calculation with respect to the Defendant.

WHEREFORE, the Defendant, Lawrence Lynch, respectfully requests the Court order the Government to produce said documents so that the Defendant might properly prepare for sentencing.

RESPECTFULLY SUBMITTED,
By The Defendant,



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CERTIFICATE OF SERVICE

I, Kevin G. Murphy, hereby certify that on this date I caused the foregoing document to be served upon the other party(ies) in this action by faxing and mailing a copy of same, to:

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Dated: June 12, 2006


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